



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

November 25, 2008

Reply to
Attn Of: ETPA-088

EPA Ref: 91-0079-BLM

Edward W. Shepard, State Director
USDI Bureau of Land Management
Western Oregon Plan Revisions
P.O. Box 2965
Portland, OR 97208

Dear Mr. Shepard:

The U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (EIS) for the Revision of the Resource Management Plans of the Western Oregon Bureau of Land Management (BLM) Districts of Salem, Eugene, Roseburg, Coos Bay, and Medford, and the Klamath Falls Resource Area of the Lakeview District (CEQ No. 20070332). Our review has been conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The Western Oregon Plan Revision (WOPR) will establish management guidelines for approximately 2.6 million acres of BLM-managed land in Western Oregon. The FEIS considers a "no action" alternative (current management under the Northwest Forest Plan) and four action alternatives, including a new Proposed Resource Management Plan (PRMP) Alternative. The PRMP Alternative has been identified as the preferred alternative and represents a number of changes from the preferred alternative identified in the Draft EIS (Alternative 2). Specifically, the PRMP defers timber harvest in much of the existing older and more structurally complex conifer forests through the year 2023; increases protection for riparian management areas; and prescribes uneven-aged management in the drier parts of the planning area in order to promote the development of fire-resilient forests.

EPA supports these proposed modifications under the PRMP, and appreciates BLM's efforts to address our comments and concerns on the Draft EIS. However, key concerns articulated in our January 9, 2008 comment letter on the Draft EIS remain. In particular, we are concerned that the PRMP still represents a significant reduction in the level of aquatic protection currently provided on BLM lands, including protection for watersheds that provide drinking water to over one million Oregonians and key watersheds for salmon conservation.

The aquatic protection currently in place has resulted in demonstrated improvements to watershed conditions across BLM lands. While in some watersheds BLM lands represent a small percentage of the ownership within a watershed, they provide a disproportionately large percentage of the intact riparian and aquatic habitat. We believe that the proposed reduction of protection for riparian areas, landslide prone areas, and key watersheds has implications for water quality and sensitive beneficial uses, such as municipal water supply and salmonid spawning and rearing. While the PRMP is an improvement over the preferred alternative in the

Draft EIS, our independent analysis leads us to believe that the analysis used in the WOPR overestimates the ability of the PRMP to fully meet shade goals and stream temperature water quality standards. Robust monitoring and analysis will be needed to evaluate management direction. In addition, the FEIS continues to rely on assumptions regarding sediment contributions from roads and unstable slopes that do not adequately capture potential sediment sources. Finally, we are concerned that the effectiveness monitoring plan in the FEIS is not adequate to support adaptive management decisions or validate plan assumptions. A clear demonstration that implementation of the PRMP protects water quality and aquatic resources is needed to support adjustments to the existing level of aquatic protection in sensitive and municipal supply watersheds.

In order to address the issues we have identified in our review, we recommend that the Record of Decision (ROD) adopt the following recommendations:

- EPA recommends that the ROD maintain the current aquatic strategy in watersheds providing drinking water and in watersheds that are sensitive to disturbance.
- Given the application of a new riparian management strategy under the PRMP, increased timber harvest, and uncertainty regarding successful aquatic protection we recommend that ROD provide or commit to the development of a robust effectiveness monitoring plan to help guide adaptive management.

EPA appreciated the opportunity to engage with BLM as a cooperating agency and believes that BLM's changes have improved the FEIS and PRMP. We also appreciate the limits that a constrained EIS schedule placed on BLM's flexibility in accommodating the full range of input from cooperating agencies and the public. EPA remains committed to working with BLM to address remaining issues during site specific analysis and project implementation. If you have any questions regarding EPA's comments, please contact me at (206) 553-1601, or Teresa Kubo of my staff at 503-326-2859.

Sincerely,

/s/

Christine B. Reichgott, Manager
NEPA Review Unit

cc: ODEQ, Neil Mulane
NOAA, Mike Tehan
USFWS, Theresa Rabot
EPA, Dave Powers